

# EXHIBIT 1

**Johnson, Ashley E.**

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**From:** Toohey, Timothy <ttoohey@greenbergglusker.com>  
**Sent:** Tuesday, May 10, 2022 10:45 AM  
**To:** Johnson, Ashley E.; McRae, Marcellus; Ochsenein, Jeremy S.  
**Cc:** Blechner, Paul; Monroe, Alayna  
**Subject:** RE: Privilege log  
**Attachments:** Terpin Privilege Log(4370347.1).xlsx

**[WARNING: External Email]**

Please find attached Mr. Terpin's privilege log. This does not include communications between Mr. Terpin and his outside counsel relating to matters involving the unauthorized SIM swap.

**Timothy Toohey**  
Attorney At Law  
[Biography](#) | [vCard](#)  
310.201.7450 Direct  
[ttoohey@greenbergglusker.com](mailto:ttoohey@greenbergglusker.com)

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**From:** Johnson, Ashley E. <AJohnson@gibsondunn.com>  
**Sent:** Monday, May 9, 2022 8:52 PM  
**To:** Toohey, Timothy <ttoohey@greenbergglusker.com>; McRae, Marcellus <MMcRae@gibsondunn.com>; Ochsenein, Jeremy S. <JOchsenein@gibsondunn.com>  
**Cc:** Blechner, Paul <pblechner@greenbergglusker.com>; Monroe, Alayna <AMonroe@gibsondunn.com>  
**Subject:** RE: Privilege log

Hi Tim,

Attached is our privilege log. This covers January 1, 2016 through the date when Mr. Terpin sent his demand letter to AT&T.

Best,  
Ashley

**Ashley Johnson**

**GIBSON DUNN**

Gibson, Dunn & Crutcher LLP  
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**From:** Toohey, Timothy <[ttoohey@greenbergglusker.com](mailto:ttoohey@greenbergglusker.com)>  
**Sent:** Monday, May 9, 2022 3:24 PM  
**To:** Johnson, Ashley E. <[AJohnson@gibsondunn.com](mailto:AJohnson@gibsondunn.com)>; McRae, Marcellus <[MMcRae@gibsondunn.com](mailto:MMcRae@gibsondunn.com)>; Ochsenbein, Jeremy S. <[JOchsenbein@gibsondunn.com](mailto:JOchsenbein@gibsondunn.com)>  
**Cc:** Blechner, Paul <[pblechner@greenbergglusker.com](mailto:pblechner@greenbergglusker.com)>  
**Subject:** Privilege log

**[WARNING: External Email]**

Ashley—our privilege log is ready. Let me know when you want to exchange. Thanks, Tim

Timothy Toohey  
Attorney At Law  
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# EXHIBIT 2

## Privilege Log on Behalf of Plaintiff Michael Terpin

PRIV NO.	DATE	DOC TYPE	AUTHOR	RECIPIENTS	CC	SUBJECT MATTER	PRIVILEGE TYPE
PRIV001	3/12/2018	Email with attachment from outside litigation counsel	Michael Terpin	Maxine Terpin		Terpin v. ATT	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV002	4/9/2018	Email with attached communication from outside litigation counsel	Michael Terpin	Maxine Terpin		Terpin v. ATT	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV003	4/10/2018	Email with attached communication from outside litigation counsel	Bed and Office Las Vegas (Maxine Terpin)	Michael Terpin		Terpin v. ATT	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV004	4/10/2018	Email with attached communication from outside litigation counsel	Michael Terpin	Bed and Office Las Vegas (Maxine Terpin)		Terpin v. ATT	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV005	4/17/2018	Email with attached communication from outside litigation counsel	Michael Terpin	Maxine Terpin		Terpin v. ATT	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV006	10/22/2018	Email with attached communication from outside litigation counsel	Michael Terpin	Maxine Terpin		Terpin v. ATT	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV007	12/24/2018	Email	Michael Terpin	Maxine Terpin		Terpin v. Truglia	Confidential Spousal Communication
PRIV008	12/24/2018	Email	Bed and Office Las Vegas (Maxine Terpin)	Michael Terpin		Terpin v. Truglia	Confidential Spousal Communication
PRIV009	1/9/2019	Email with attached communication from outside litigation counsel	Michael Terpin	Maxine Terpin		Terpin adv. Pinsky	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV010	1/12/2019	Email	Michael Terpin	Maxine Terpin		Terpin v. Truglia; Terpin adv. Pinsky	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV011	1/16/2019	Email	Bed and Office Las Vegas (Maxine Terpin)	Michael Terpin		Terpin v. Truglia; Terpin adv. Pinsky	Confidential Spousal Communication

## Privilege Log on Behalf of Plaintiff Michael Terpin

PRIV NO.	DATE	DOC TYPE	AUTHOR	RECIPIENTS	CC	SUBJECT MATTER	PRIVILEGE TYPE
PRIV012	1/16/2019	Email	Michael Terpin	Bed and Office Las Vegas (Maxine Terpin)		Terpin v. Truglia	Confidential Spousal Communication
PRIV013	1/17/2019	Email	Michael Terpin	Michael Shuler (Transform Group)		Terpin v. Truglia	Attorney-Client; Attorney Work Product
PRIV014	1/17/2019	Email with attached communication from outside litigation counsel	Michael Shuler (Transform Group)	Michael Terpin		Terpin v. Truglia	Attorney-Client; Attorney Work Product
PRIV015	1/17/2019	Email with attached communication from outside litigation counsel	Michael Shuler (Transform Group)	Michael Terpin		Terpin v. Truglia	Attorney-Client; Attorney Work Product
PRIV016	2/7/2019	Email	Michael Terpin	Neil McCarthy	Maxine Terpin	Terpin adv. Pinsky	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV017	4/3/2019	Email with attached communication from outside litigation counsel	Michael Terpin	Maxine Terpin		Terpin adv. Pinsky	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV018	4/3/2019	Email with attached communication from outside litigation counsel	Michael Terpin	Maxine Terpin		Terpin adv. Pinsky; Terpin v. Truglia	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV019	8/2/2019	Email with attached communication from outside litigation counsel	Michael Terpin	Maxine Terpin		Terpin adv. Pinsky; Terpin v. Truglia	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV020	8/7/2019	Email with attached communication from outside litigation counsel	Bed and Office Las Vegas (Maxine Terpin)	Michael Terpin		Terpin adv. Pinsky	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV021	8/7/2019	Email with attached communication from outside litigation counsel	Michael Terpin	Bed and Office Las Vegas (Maxine Terpin)		Terpin adv. Pinsky	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV022	8/23/2019	Email with attached communication from outside litigation counsel	Michael Terpin	Maxine Terpin		Terpin v. ATT	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV023	10/20/2019	Email	Michael Terpin	Maxine Terpin		Fwd: open letter to FCC - draft	Confidential Spousal Communication

# 2249  
 Privilege Log on Behalf of Plaintiff Michael Terpin

PRIV NO.	DATE	DOC TYPE	AUTHOR	RECIPIENTS	CC	SUBJECT MATTER	PRIVILEGE TYPE
PRIV024	10/20/2019	Email	Bed and Office Las Vegas (Maxine Terpin)	Michael Terpin		Re: open letter to FCC - draft	Confidential Spousal Communication
PRIV025	3/2/2020	Email	Michael Terpin	Maxine Terpin		Terpin adv. Pinsky	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV026	3/5/2020	Email	Michael Terpin	Maxine Terpin		Terpin adv. Pinsky	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV027	3/10/2020	Email	Google Calendar Notification	Michael Terpin	David Lathrop (Transform Group); outside litigation counsel	Terpin adv. Pinsky	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV028	3/14/2020	Email with attached communication from outside litigation counsel	Michael Terpin	Maxine Terpin		Terpin v. ATT	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV029	4/10/2020	Email with attached communication from outside litigation counsel	Michael Terpin	Maxine Terpin		Terpin v. ATT	Confidential Spousal Communication; Attorney-Client; Attorney Work Product
PRIV030	9/8/2020	Email with attached communication from outside litigation counsel	Michael Terpin	Ian Chaffee (Transform Group)	attlawsuit@transformgroup.com	Terpin v. ATT	Attorney-Client; Attorney Work Product

# **EXHIBIT 3**



**Johnson, Ashley E.**

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**From:** Toohey, Timothy <ttoohey@greenbergglusker.com>  
**Sent:** Tuesday, March 27, 2018 3:08 PM  
**To:** OKCU, NIKI (Legal); O'Donnell, Pierce  
**Subject:** RE: Terpin v. AT&T

Ms. Okcu:

Thank you for your e-mail and speaking with Mr. O'Donnell and myself.

This is to confirm that the March 30, 2018 deadline in Mr. O'Donnell's March 19, 2018 letter to Mr. McAtee is extended for two weeks to April 13, 2018.

Tim Toohey

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**From:** OKCU, NIKI (Legal) [mailto:no4774@att.com]  
**Sent:** Tuesday, March 27, 2018 1:02 PM  
**To:** O'Donnell, Pierce <podonnell@greenbergglusker.com>; Toohey, Timothy <ttoohey@greenbergglusker.com>  
**Subject:** Terpin v. AT&T

Mr. O'Donnell/Mr. Toohey –

It was nice speaking with you. I wanted to send this email so you have my contact information. I will look for a confirming email from you on the extension.

Thank you.

**Niki Okcu | AVP – Senior Legal Counsel | AT&T**  
430 Bush Street, 3rd Floor | San Francisco, CA 94108 | 415.276.5656

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#

**Timothy Toohey | Attorney At Law**  
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# **EXHIBIT 4**

**From:** [Toohey, Timothy](#)  
**To:** [OKCU, NIKI \(Legal\)](#)  
**Subject:** RE: Terpin v. AT&T -- Complaint  
**Date:** Wednesday, August 15, 2018 5:34:07 PM

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Niki—I would be happy to discuss this. We would request that AT&T execute a waiver of the service of summons to avoid the expense of a process server. Tim Toohey

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**From:** OKCU, NIKI (Legal) <no4774@att.com>  
**Sent:** Wednesday, August 15, 2018 11:10 AM  
**To:** Toohey, Timothy <ttoohey@greenbergglusker.com>  
**Subject:** Terpin v. AT&T -- Complaint

Hi Tim –

Do you have a few minutes today or tomorrow to discuss the service of the complaint?  
Thanks.

Niki Okcu | AVP – Senior Legal Counsel | AT&T

430 Bush Street, 3rd Floor | San Francisco, CA 94108 | 415.276.5656

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# EXHIBIT 5

**Johnson, Ashley E.**

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**From:** Toohey, Timothy <ttoohey@greenbergglusker.com>  
**Sent:** Tuesday, August 21, 2018 6:38 PM  
**To:** OKCU, NIKI (Legal)  
**Subject:** AT&T Inc.

Niki—thanks for the pleadings. We agree to dismiss AT&T Inc. without prejudice. I will also prepare a form for your signature for waiver of summons and acceptance of the complaint. I suggest we file these at the same time.

Tim

**Timothy Toohey | Attorney At Law**

D: 310.201.7450 | F: 310.201.2304 | [ttoohey@greenbergglusker.com](mailto:ttoohey@greenbergglusker.com)

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